## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: ETHICON PHYSIOMESH	: MDL DOCKET NO. 2782			
FLEXIBLE COMPOSITE	: CIVIL ACTION NO.			
HERNIA MESH PRODUCTS	: 1:17-MD-02782-RWS			
LIABILITY LITIGATION	:			
This document relates to:	· 2			
Bader A. Sueifan	: Civil Action No.:			
	:			
	:			
SHORT FOR	RM COMPLAINT			
Come now the Plaintiff(s) named be	Come now the Plaintiff(s) named below, and for their Complaint against the			
Defendants named below, incorporate t	the Master Complaint in MDL No. 2782 by			
reference. Plaintiff(s) further show the	court as follows:			
1. Plaintiff Implanted with Physiome	esh			
Bader A. Sueifan				
2. Plaintiff's Spouse (if applicable)				
N/A	_			
3. Other Plaintiff and capacity (i.e., conservator)	administrator, executor, guardian,			
N/A				
	_			

4.	State of Residence and Citizenship of each Plaintiff (including any Plaintiff in a representative capacity) at time of filing of Initial Complaint			
	Illinois			
5.	ate of Residence and Citizenship at the Time of Implantation			
6.	District Court and Division in which personal jurisdiction and venue would be proper absent direct filing.  United States District Court of the Southern District of Illinois			
7.	Defendants (Check Defendants against whom Complaint is made):  A. Ethicon, Inc.  B. Johnson & Johnson			
8.	Basis of Jurisdiction  Diversity of Citizenship (28 U.S.C. § 1332(a))  Other:			
	A. Paragraphs in Master Complaint upon which venue and jurisdiction lie  Paragraphs 11-13			

B. Other allegations of jurisdiction and venue:	
N/A	
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9.

Date(s) Plaintiff was Implanted with Physiomesh (list date of each implant surgery, where applicable, on separate line)	Hospital(s) where Plaintiff was implanted with Physiomesh (include City and State of Hospital)	Implanting Surgeon(s)
01/23/2012	Barnes-Jewish Hospital; St. Louis, MO	Douglas Schuerer, MD

10. Coun	ts in the Master Complaint brought by Plaintiff(s):
<b>✓</b>	Count I – Strict Product Liability – Defective Design
<b>~</b>	Count II – Strict Product Liability – Failure to Warn
<b>~</b>	Count III - Strict Product Liability - Manufacturing Defect
<b>~</b>	Count IV – Negligence
<b>~</b>	Count V – Consumer Protection Laws (Please identify applicable State Consumer Protection law(s) and state any additional facts and legal basis for application of State Consumer Protection law(s) in this case)
815 III.	Comp. Stat. 505/1 through 505/12 Consumer Fraud and Deceptive Business Practices Act
<b>✓</b>	Count VI – Gross Negligence
	Count VII – Loss of Consortium
<b>V</b>	Count VIII – Punitive Damages
<b>V</b>	Count IX – Discovery Rule, Equitable Tolling/Estoppel (Please state any additional facts and legal basis for Discovery Rule and Tolling below)
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Other Count(s) (Please state factual and legal basis for other claim not included in the Master Complaint below):		
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Jury Trial is Demanded as to All Counts		
Jury Trial is NOT Demanded as to Any Count		
<sub>S</sub> / Katelyn E. Richardson		
Attorney(s) for Plaintiff		
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